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February 23, 2022

VIA ECF

Honorable Pamela K. Chen
United States District Judge
Eastern Division of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Honorable James Wicks
United States District Judge
Eastern Division of New York
100 Central Plaza
Central Islip, New York 11722

Re: *FIORDIROSA V. PUBLISHERS CLEARING HOUSE, INC.*, Case No. 1:21-CV-6682

Dear Judge Chen and Magistrate Judge Wicks:

We write jointly on behalf of Defendant Publishers Clearing House, LLC (“PCH”) and Plaintiffs Attilio Fiordiroso, Thomas Green, Ivan Kenter, Becky Palmer, and Ruth Tanenbaum (collectively, “Plaintiffs”) in five now-consolidated actions¹.

On February 18, 2022, in response to the Defendant’s pre-motion to dismiss letter (Dkt. 16), Plaintiffs informed the Defendant that they intend to file an amended complaint no later than March 9, 2022 and asked for the Defendant’s consent to the amendment. Given that this would be Plaintiffs first amendment, the Defendant agreed to accept service of the amended complaint. Additionally, with Your Honors’ consent, the Parties agreed that PCH would respond to the amended complaint within fourteen (14) days of its filing.

Lastly, the Parties jointly request the adjournment of the Initial Conference scheduled for March 2, 2022 before Judge Wicks. Given the anticipated amendment and subsequent motion to dismiss, we request an adjournment of the Initial Conference until after any pre-motion

¹ The Consolidated Actions include: (1) *Fiordiroso v. Publishers Clearing House, Inc.*; (2) *Green v. Publishers Clearing House, Inc.*; (3) *Kenter v. Publishers Clearing House, Inc.*; (4) *Palmer v. Publishers Clearing House, Inc.*; and (5) *Tanenbaum v. Publishers Clearing House, Inc.*.

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conference and motion to dismiss briefing, if permitted. We believe this will promote judicial economy and the most efficient use of all parties' resources.

Respectfully submitted,

By: /s/ Robyn M. Feldstein

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